

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Towanda Y. Reason : No. 19-10992-MDC
Debtor : :

ANSWER TO MOTION OF SPECIALIZED LOAN SERVICING, LLC.
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted,
6. Admitted.
7. Admitted in part. Debtor avers a payment of \$2,500.00 was made in January and the debtor informed Movant in February that she had been injured at work and was awaiting compensation. The debtor is now receiving short term-disability and avers two payments were made this month and expects to make two more payments this month. Debtor asks for the chance to catch up and to explore forbearance options as a result of her injury and the current health crisis.
8. Debtor wishes to avoid the same.
9. Debtor is unsure of the total amount owed as she made two payments already this month. Debtor to provide proof of the same.
10. Denied.
11. No objection to Movant's request to communicate directly with the Debtor to offer assistance.
12. No response.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 4/21/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of Specialized Loan Servicing, LLC.
Bkgroup@kml1lawgroup.com

Dated: 4/21/20

/s/ David M. Offen
David M. Offen
Attorney for Debtor